

EXHIBIT 4

KEKER & VAN NEST LLP

633 Battery Street
San Francisco, CA 94111-1809
415 391 5400
kvn.com

Eduardo E. Santacana
(415) 773 6669
esantacana@kvn.com

April 12, 2016

VIA ELECTRONIC MAIL

Amy H. Candido
Quinn Emanuel Urquhart & Sullivan, LLP
50 California Street, 22nd Floor
San Francisco, CA 94111
amycandido@quinnmanuel.com

Re: *Cisco Systems v. Arista Networks, Inc.*; Case No. 5:14-cv-05344-BLF

Dear Amy:

Arista disagrees with your characterization of Judge Freeman's Orders increasing the deposition limits in this case. Judge Freeman increased the deposition limit for both parties to twenty depositions plus Rule 30(b)(6) depositions on December 4, 2015. ECF No. 137. The Court imposed no constraints on how Arista or Cisco could use their first twenty depositions. Then, on February 17, 2016, the Court increased the deposition limit again, by five more. ECF No. 203. Arista had requested an additional twenty, and it detailed a proposed plan on how it would use them. ECF 181. In granting an additional five depositions, the Court did not purport to limit how Arista could use its first twenty. It simply ordered: "Arista may take an additional five depositions in excess of the twenty depositions previously allowed."

Cisco's position inaccurately conflates the Order the Court made in February with the Order the Court made in December in an improper attempt to limit how Arista can use the discovery tools at its disposal at the very end of fact discovery. Any limitation of Arista's use of its first twenty depositions is unjustified. Arista could not predict in February, long before Cisco completed document production, precisely how it would use its depositions, and neither Cisco nor the Court asked it to. Indeed, Cisco produced the documents of Ms. Jiandani, Mr. Chambers, and Mr. Westfield, as well as many documents that include Mr. Malik as a recipient, all after the Court's February Order. Arista is entitled to take the depositions of those individuals among its permitted twenty-five depositions, just as Cisco has freely selected its depositions.

We requested many of these depositions over a week ago. Given the impending discovery cutoff, Arista asks that Cisco make itself available for a meet and confer call this morning. If the meet and confer is not successful, Arista asks that Cisco agree to submit a joint letter brief to Judge Freeman as soon as possible in order to resolve this issue without undue delay. The parties can discuss the particulars on their call this morning.

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Via Electronic Mail

Please provide a time for this morning. We are available at any time that is convenient for Cisco.

Very truly yours,

KEKER & VAN NEST LLP



Eduardo E. Santacana

cc: Cisco-Arista@quinnmanuel.com
Cisco-AristaCopyrightTeam@kirkland.com
ARISTA-KVN@kvn.com
ARISTA-WSGR@wsgr.com